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February 3, 2020

Via E-Filing and E-Mail (Parker NYSDChambers@nysd.uscourts.gov)

The Honorable Katharine H. Parker
United States District Court Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street, Room 750, Room 750
New York, New York 10007

Re: Blake Marine Group, LLC v. Frenkel & Company
Docket No: 1:18 Civ. 10759 (AT)
NH&S File No.: 0-1312 JAVN/TLS/PN

Fact discovery is extended to February 20, 2020 for the sole purpose of conducting the deposition of James Power.

SO ORDERED:

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

Dear Judge Parker:

Our office represents Frenkel & Company in the above captioned case. On Friday 02/03/2020 January 31, 2020, we filed a letter motion requesting the Court order Holland & Knight to comply with outstanding discovery and set dates for their compliance. (R. Doc. 112.) Shortly after filing the letter, our office was contacted by James Power of Holland & Knight who advised that he is available to sit for a deposition on February 20, 2020 in New York. Mr. Power also advised that a certification pursuant to Rule 26(g) that discovery is complete would be provided prior to that deposition.

The current discovery deadline is February 19, 2020. We request an extension of that date solely to allow for Mr. Power's deposition to be conducted on February 20, 2020. Should the Court grant this limited extension, Frenkel withdraws its request that the Court order dates for receipt of the Rule 26 certification and for the deposition of James Power.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By:

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cc: Via E-Filing
James Power, Esq.
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